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JAP:AFM

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IN THE MATTER OF THE SEARCH OF A :  
SILVER TOYOTA COROLLA SEDAN :  
BEARING NEW YORK LICENSE PLATE :  
GZD-3140, AND CLOSED COMPARTMENTS :  
AND CONTAINERS FOUND INSIDE :  
:  
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**AFFIDAVIT IN SUPPORT OF  
APPLICATION FOR  
SEARCH WARRANT**

EASTERN DISTRICT OF NEW YORK, SS:

JACABED VENTURA being duly sworn, deposes and states that she is a  
Special Agent with the United States Postal Service, Office of Inspector General ("USPS  
OIG"), duly appointed according to law and acting as such.

Upon information and belief, there is probable cause to believe that there is  
kept and concealed within the vehicle known and described as a SILVER TOYOTA  
COROLLA SEDAN BEARING NEW YORK LICENSE PLATE GZD-3140 AND  
CLOSED COMPARTMENTS AND CONTAINERS FOUND INSIDE (the "Target  
Vehicle"), items which constitute evidence, fruits and/or instrumentalities of delay of mail, in  
violation of Title 18, United States Code, Section 1703, as further described in Attachment  
A, hereto.

The source of your deponent's information and the grounds for her belief are as follows:<sup>1</sup>

1. I am a Special Agent with the USPS OIG and have been involved in the investigation of numerous cases involving delay of mail. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, and reports of other law enforcement officers involved in the investigation.

2. On or about August 25, 2017, the USPS OIG received information in reference to undelivered mail found in mail tubs on a street corner in the vicinity of Rochdale Village in Queens, New York. Law enforcement agents recovered the tubs and found that they contained approximately 1,200 pieces of mail. One of the tubs contained mail from various routes in Queens Village in Queens, New York, and the other three tubs appeared to contain mail from a route in Saint Albans in Queens, New York (the "Saint Albans Route").<sup>2</sup> Many of the pieces of mail were intended to be delivered to residents and businesses in Queens, New York.

3. The mail from the Saint Albans Route was to have been delivered on or about May 25, 2017.

4. I determined through Postal Service databases that Naomi Mitchell was the letter carrier assigned to the Saint Albans Route on May 25, 2017, and that no other person assisted or substituted for her on that day. I further determined that on or about and

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1 Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2 Each carrier receives tubs containing mail designated to the carrier's particular mail route upon reporting to work. Each tub displays a code unique to the route.

between February 2017 and April 2017, just prior to her assignment to the Saint Albans post office, Mitchell was assigned to the post office in Queens Village, New York.


5. Mitchell no longer works as a letter carrier, but instead works at a Postal Service facility near John F. Kennedy International Airport in Queens, New York ("JFK Airport").

6. On or about September 18, 2017, I interviewed Naomi Mitchell near her place of work. Mitchell was advised of her Miranda rights and agreed to waive those rights and speak with agents without an attorney present. Mitchell confirmed that she worked on the Saint Albans Route on May 25, 2017. Mitchell also said that, despite no longer working as a letter carrier, she had a letter carrier's satchel in her car which might contain some undelivered mail. Mitchell said that the Target Vehicle is her car.

7. The Target Vehicle is parked near Naomi Mitchell's workplace at JFK Airport. The license plate on the Target Vehicle is registered to Mitchell.

8. Based upon the foregoing, I submit that there is probable cause to believe that a search of the Target Vehicle will reveal that it contains items, which constitute evidence, fruits and/or instrumentalities of delay of mail, in violation of Title 18, United States Code, Section 1703, as further described in Attachment A hereto. Accordingly, I respectfully request that the search warrant specified above be issued.

WHEREFORE, deponent prays that a warrant be issued to search the Target Vehicle.



JACABED VENTURA  
Special Agent, United States Postal Service,  
Office of Inspector General

Sworn to before me this



STEVEN E. TISCIONE  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK

**ATTACHMENT A**

The following items may be seized from the silver Toyota Corolla sedan bearing New York license plate GZD-3140, and closed compartments and containers found inside: (1) mail pieces; (2) tubs, satchels and other paraphernalia and containers related to the storage and transportation of mail.